

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

KATIANA SOENEN, TAJA HIRATA-
EPSTEIN, CHLOE BURNS, EMMA
DENNIS-KNIERIEM, JANE DOES 1-2,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY,

Defendant.

CLASS ACTION

C.A. No. 1:21-cv-00325-JJM-PAS

Jury Trial Demanded

**DECLARATION OF PLAINTIFF JANE DOE 2 IN SUPPORT
OF THE MOTION TO PROCEED UNDER A PSEUDONYM**

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the following is true and correct:

1. I am a plaintiff in the above-captioned lawsuit.
2. I joined this matter as a plaintiff via the First Amended Class Action Complaint (the “Amended Complaint”) filed on January 28, 2022.
3. I am a current Doctor of Philosophy (PhD) student in the Department of Religious Studies (the “Department”) at Brown University (“Brown”).
4. As part of my PhD completion requirements, I am required and currently teach undergraduate students in the Department at Brown.
5. This lawsuit involves sexual harassment perpetrated against me by another doctoral student in the Department, who remains on campus in the Department.

6. On or about September 18, 2019, I filed a Formal Complaint with Brown's Title IX Office regarding the sexual harassment perpetrated against me and obtained a No Contact Order against my assaulter, which remains in effect.

7. The sexual harassment perpetrated against me ultimately led to me taking a leave of absence from Brown and missing the Spring 2020 semester due to the trauma I suffered.

8. The sexual harassment perpetrated against me has caused me to limit my presence on Brown's campus to only my teaching responsibilities.

9. I am requesting that this Court allow me to use the pseudonym "Jane Doe 2," instead of my real name, for purposes of this litigation.

10. While this lawsuit relates to Brown's mishandling of the sexual harassment perpetrated against me by another doctoral student, I have a significant interest in maintaining my privacy and avoiding any public association between myself and my assaulter.

11. Given the highly sensitive and personal nature of the sexual harassment perpetrated against me, I believe that proceeding with this lawsuit under my real name will have an immediate and irreparable effect on me and my reputation, future educational, and employment opportunities, and personal relationships.

12. My public identification would needlessly interfere with my efforts to process, cope with, and recover from the conduct described in the Amended Complaint. I am also concerned about my personal safety.


13. Because I am still a Brown student and currently teach on Brown's campus, I am concerned that I may suffer retaliation and reputational harm if my true identity is revealed.

14. I also worry that my family will suffer severe emotional distress if my name is publicly disclosed.

15. I have taken great care to protect the nature of my claim and have not revealed my identity or otherwise sought publicity in this matter.

16. I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2022

By: 
Verified by pdfFiller
02/04/2022
Jane Doe 2